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February 22, 2012

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**Re: Annual 63.2009(e) CPNI Certification – 2011 – iBasis, Inc. and KPN INS., Inc.  
Form 499 filed IDS – 825377 and 822522**

Dear Ms. Dortch:

Attached for filing is an original and four copies of the iBasis Inc. and KPN INS Inc. CPNI certification, filed pursuant to 47 CFR Section 64.2009(e). If you have any questions regarding this filing, do not hesitate to contact me.

Sincerely,

Ellen W. Schmidt, Vice-President, General Counsel and Secretary

No. of Copies rec'd 044  
List ABCDE

**Annual 47 C.F.R. Sec. 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) Certification for 2011

Date: February 22, 2012

Name of Company: iBasis, Inc. and its wholly-owned subsidiary KPN INS., Inc.

Form 499 Filer ID: 825377 and 822522

Name of Signatory: Ellen W. Schmidt

Title of Signatory: Vice-President, General Counsel and Secretary, iBasis Inc.  
General Counsel and Secretary, KPN, INS., Inc.

I, Ellen W. Schmidt, certify that I am an officer of the companies named above ("Companies")<sup>1</sup>, and acting as an agent of the Companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure that they are in compliance with the requirements set forth in Section 64.2002 et.sec. of the Commission's rules.

In addition, as required by the Commission's rules, we can report that in the past year the Companies have not taken any actions against data brokers, or has it received any customer complaints concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 CFR Sec. 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: \_\_\_\_\_

Ellen W. Schmidt

<sup>1</sup> KPN INS, Inc. is a wholly owned subsidiary of iBasis, Inc and is managed by the same individuals, and complies with the same CPNI practices and requirements.

## **Statement Regarding iBasis CPNI Compliance Activities**

In order to ensure that the Company is in compliance with the requirements set forth in Section 64.2002 et. sec. of the Commission's rules (the "Rules"), the Company has taken the following actions:

### **Communication of Rules to Management**

The Legal Department held numerous meetings with managers within the Company to provide an overview and understanding of the rules.

### **Policies and Procedures Development and Documentation**

As a result of the Management meetings a policy and procedures document was developed that reflects the alignment of the business policies and practices with the legal requirements of the Rules. This document addresses the specific rules relating to issues such as:

- Access to CPNI and CDRs – online and phone requests

Authentication process requirements  
Issues re account changes and passwords

- Recording and maintaining information

Tracking of CPNI requests  
Breach Notification Forms and process

- Customer and agency notification issues
- Marketing practices and privacy policies

### **Employee Responsibilities**

Specific employees were identified to take responsibility for various aspects of the process to ensure ongoing compliance with the Rules, including processing CPNI requests, recording and maintaining records, notification, oversight, legal questions etc.

### **Employee Training**

Various training sessions with affected employees and customer service representatives were held to go over the rules and the policy and procedure document. The policy and procedures document is posted on the Company's intranet for access by current and future employees.